

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

**LISA MINTON,**

**Plaintiff,**

**v.**

**TRUMBULL BOTTLED WATER, INC.,**

**Defendant.**

**Case No. 1:05-cv-878-CSC**

**AFFIDAVIT OF JAY TRUMBULL**

STATE OF FLORIDA       )

BAY COUNTY             )

Before me, the undersigned Notary Public in and for Bay County, Florida, personally appeared Jay Trumbull, who, being first duly sworn, testifies, deposes, and says as follows:

1. My name is Jay Trumbull. I am over the age of twenty-one (21) and competent to testify. I swear that the following facts, of which I have personal knowledge, are true and correct.

2. I am the President of Trumbull Bottled Water, Inc. ("Trumbull"), the defendant in this case. The company is headquartered in Panama City, Florida, and we also have a branch in Dothan, Alabama.

3. Since I became President in around 1995, I have had exclusive hiring authority at both of our branches. Pete Rawlins is the Manager of our Dothan facility, but he has never possessed hiring authority for any positions.

4. I understand Lisa Minton claims in this lawsuit that Mr. Rawlins told her "he" could not hire a woman for the Route Sales position that was advertised in the Dothan newspaper in early 2005. If Mr. Rawlins made such a statement—and I do not believe that he did—he had no authority

to do so, and was certainly not speaking on behalf of Trumbull. Any such statement would have been contrary to our policy of non-discrimination.

5. Ms. Minton did not apply for the Route Sales position, or any position, in January 2005. However, she would have been welcome to apply. We keep blank applications on the front counter of the Dothan office, and anyone who wishes to apply for a job is free to do so.


6. We have never discriminated against any job applicant on the basis of gender, race, age, or any other impermissible reason. In fact, we have had many female employees at both facilities. For example, from 2001 through 2005, we hired a total of 111 employees to work at the Dothan facility. 63 were female. At the end of January 2005 we hired George R. Grimes for the Route Sales position Ms. Minton claims she was interested in, but this decision had nothing to do with gender. All six of the applicants were male, and as stated above, Ms. Minton did not apply.

7. Ms. Minton submitted an application to us on March 2, 2006. I had scheduled an interview with her for April 10, 2006 at the Dothan office (although I am based in Panama City), but on the morning of the interview a man telephoned to report that Ms. Minton had a "family emergency," and could not make the interview. The caller, who did not identify himself other than by calling himself a "friend" of Ms. Minton's, said Ms. Minton would call back to reschedule the interview, but she has not called as of the date of this affidavit.

FURTHER AFFIANT SAITH NOT.

  
Jay Trumbull

Sworn to and subscribed before me this the  
19<sup>TH</sup> day of April, 2006.

  
Notary Public  
My Commission Expires: 3/12/08



Judy R. Reece  
My Commission DD289131  
Expires March 12, 2008